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*Attorneys for Indirect Purchaser Plaintiffs
Trong Nguyen, Roxanne Miller, and TechToysForLess*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

TRONG NGUYEN,

Plaintiff,

vs.

SAMSUNG ELECTRONICS COMPANY
LTD., et al.,

Defendants.

A COMPUTER PLACE, INC., and
TIMOTHY CHANDA,

Plaintiffs,

vs.

SAMSUNG ELECTRONICS COMPANY
LTD., et al.,

Defendants

CASE NO. C07-0086 SBA

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING ALTERNATIVE
DISPUTE RESOLUTION**

CASE NO. C07-1020 SBA

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ROXANNE MILLER,

Plaintiff,

vs.

Samsung Electronics Company Ltd., et al.,

Defendants.

CASE NO. C07-1147 SBA

TECHTOYSFORLESS,

Plaintiff,

vs.

SAMSUNG ELECTRONICS COMPANY
LTD., et al.,

Defendants.

CASE NO. C07-1418 SBA

STIPULATION

WHEREAS, the above-captioned cases have been deemed related pursuant to Local Civil Rule 3-12;

WHEREAS, there are currently pending approximately 23 separate actions alleging antitrust violations in connection with Flash products, and a motion for transfer and coordination of these cases pursuant to 28 U.S.C. Section 1407 is currently pending with the Judicial Panel on Multidistrict Litigation;

WHEREAS, the parties believe it would be unwieldy, inefficient, and unproductive to conduct alternative dispute resolution discussions in the many pending actions until an interim lead plaintiffs' counsel is appointed;

WHEREAS, the parties anticipate the Court's appointment of interim lead class counsel who shall have responsibility for consulting with other plaintiffs' counsel in the selection of alternative dispute resolution;

WHEREAS, pursuant to Civil Local Rule 16-8(b) and ADR Local Rule 3-5(b), the undersigned direct purchaser plaintiffs, indirect purchaser plaintiffs, and defendants in these actions, by and through the undersigned attorneys, have met and conferred regarding these issues;

PLAINTIFFS AND DEFENDANTS, BY AND THROUGH THE UNDERSIGNED COUNSEL, HEREBY STIPULATE AND AGREE AS FOLLOWS:

1. The parties agree that the selection of an alternative dispute resolution process is premature at this time;

2. The parties agree to resume discussions on the selection of an alternative dispute resolution process after the appointment of interim lead class counsel, and in the context of further meet and confer discussions on case management.

1 DATED: May 10, 2007

PEARSON, SIMON, SOTER, WARSHAW
& PENNY, LLP

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3 By:

Esther Klisura
Esther L. Klisura

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5 *Attorneys for Direct Purchaser Plaintiffs A*
6 *Computer Place, Inc. and Timothy Chanda*
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9 DATED: May 10, 2007

FURTH LEHMANN LLP

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11 By:

Esther Klisura with permission from
Christopher Lebsock

12 *Attorneys for Indirect Purchaser Plaintiffs Trong*
13 *Nguyen, Roxanne Miller, and TechToysForLess*
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16 DATED: May 10, 2007

SHEPPARD MULLIN RICHTER & HAMPTON
LLP

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18 By:

Mona Solouki
Mona Solouki

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20 *Attorneys for Defendant Samsung Semiconductor,*
21 *Inc. and with permission from Defendants*
22 *Hitachi America, Ltd., Renesas Technology*
23 *America, Inc., Micron Technology, Inc., Micron*
24 *Semiconductor Products, Inc., Hynix*
25 *Semiconductor America, Inc., Toshiba America*
26 *Inc., Toshiba America Electronics Components,*
27 *Inc., and Mosel Vitelic Corporation (USA)*
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PROPOSED ORDER

IT IS SO ORDERED.

Dated: 5/15/07

By: *Saundra B. Armstrong*
Honorable Saundra B. Armstrong
United States District Court Judge